REMARKS

Applicants appreciate the Examiner's review of the present claims and respectfully request reconsideration based on the following remarks. Claims 1-12 are pending in the present application.

Rejections under 35 U.S.C. 103(a)

The Examiner has rejected claims 1-12 under 35 U.S.C. 103(a) as being obviated by U.S. Patent No. 6,449,657 to Stanbach by itself. Applicants traverse this rejection.

Stanbach discloses a system for forwarding emails to a transfer agent, which then scans the email header and body and selects appropriate advertisements to insert in the email based on the content of the email and the recipient. See Stanbach, Col. 9 line 56 through Col. 10 line 14. This is in stark contrast to the present invention, which is directed towards a system and method for creating a message campaign, the message campaign providing a narrative framework for creating personalized messages for an intended audience. The personalized messages are created based on user profile data on the intended audience. See Claims 1 and 9. The system and method assist a client in creating the message campaigns. A default message example is created, and from this default message example then general characteristics of intended audiences can be delineated, as well as factors used for searching databases to identify members of the intended audience. The system and method assists with other parts of developing the message campaign, including using the default message example to create a message template and also a message resource library. Claims 1 and 9 generally. Applicants respectfully assert that Stanbach is completely different from the present invention, and Stanbach either alone or combined with other references does not disclose all the features recited for the present invention.

More particularly, the Examiner states that Stanbach shows 'creating at least one default message example of a personalized message'. The Examiner cites Fig. 7, Col. 10 lines 15-67, and Col. 16 lines 8-12 and 34-36, without identifying anything in the reference that teaches or

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suggests 'creating at least one default message example of a personalized message'. Contrary to the Examiner's characterization, the referenced sections of Stanbach disclose an email forwarding and email header/body parsing system (Fig. 7 and Col. 10 lines 15-67), and an HTML frame template with insertable fields (Col. 16 lines 8-12 and 34-36). Applicants respectfully submit that nothing in Stanbach teaches creating at least one default message example of a personalized message, as claimed in Claim 1, Claim 9 and also Claim 12.

The Examiner states that Stanbach shows 'creating an entity profile template including a substantially complete definition of information about each of said entities that is to be acquired by said database search' and cites Col. 11 lines 11-22. Applicants respectfully disagree. The referenced section of Stanbach discloses simply querying a database for demographic information regarding a particular email recipient. Applicants respectfully submit that nothing in Stanbach teaches creating an entity profile template, more particularly creating an entity profile template including a substantially complete definition of information about each of said entities that is to be acquired by said database search, as claimed in Claims 1, 9 and 12.

The Examiner states that Stanbach shows 'using said entity profile template for generation of target entities profiles and status'. The Examiner cites several large sections of Stanbach, Col. 11 lines 1-60, Col 18 line 44 to Col. 19 line 13, and Col. 20 line 65 to Col. 21 line 37; without identifying anything in those sections that teach or suggest this feature. As previously shown, Stanbach does not teach or suggest creating an entity profile template, and Applicants assert that nothing in the cited sections teach or disclose using the created entity profile template for generation of target entities profiles and status, as claimed in Claims 1, 9 and 12. Applicants assert that this feature is not disclosed by any cited references.

The Examiner states that Stanbach shows 'constructing a message template' and cites Col. 9 line 56 to Col. 10 line 10, and Col. 20 lines 51-60. Applicants respectfully disagree. The referenced sections of Stanbach disclose the system for forwarding emails to a transfer agent that scans the email header and body and selects appropriate advertisements to insert in the email based on the content of the email and the recipient (Col. 9 line 56 to Col. 10 line 10); and an ads

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table configured to store advertisements in various file formats (Col. 20 lines 51-60). Applicants respectfully submit that nothing in Stanbach teaches constructing a message template as claimed in Claims 1, 9, and 12.

The Examiner indicates that Stanbach at Col. 9 lines 64-66 discloses constructing a message resource library. Applicants disagree, and respectfully assert that Stanbach at Col. 9 lines 64-66 discloses selecting a set of advertisements matching an email recipient's demographic profile. This is not equivalent to constructing a message resource library as recited by the independent claims.

Accordingly, Applicants assert that Stanbach either alone or in combination with any other reference does not disclose each and every feature of independent Claims 1, 9 and 12 therefore these claims are allowable.
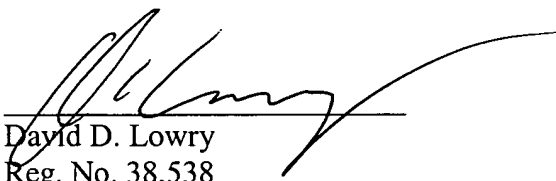
Regarding Claims 2-8 and 10-11, these claims are allowable as depending upon allowable independent claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below.

In the event any extensions of time for responding are required for the pending application(s), please treat this paper as a petition to extend the time as required and charge Deposit Account No. 50-0369 for the required fee

Respectfully submitted,

10/16/03
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